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E-filed 6/30/2021

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

SCHULTE PROPERTIES LLC

Debtor,

Case No. BK-S-18-12734-MKN
Chapter 11

**DEBTOR'S LIMITED OPPOSITION
TO SHELLPOINT MORTGAGE
SERVICING; FIFTH THIRD
MORTGAGE COMPANY; AND
CITIMORTGAGE, INC'S MOTION
FOR PROTECTIVE ORDER OR, IN
ALTERNATIVE, MOTION FOR
MODIFICATION OF SUBPOENA
[FED. R. CIV. PROC. 26(c); FED R.
BANKR. PROC. 7026; LBR 7037]**

Hearing Date: July 14, 2021
Hearing Time: 10:30 a.m.

Debtor SCHULTE PROPERTIES LLC (hereinafter "Debtor"), by and through its counsel, Matthew L. Johnson, of the law firm of Johnson & Gubler, P.C., submits its limited Opposition to the Motion for Protective Order or, in Alternative, Motion for Modification of Subpoena as follows:

1. Debtor is not requesting documents that have already been produced in this matter.
2. Debtor is only requesting documents that have not been provided and documents that are not accessible by the Debtor.
3. Additionally, Debtor is requesting documents to have a complete loan file to better

1 respond to objection claims in this matter.

2 C. Conclusion

3 The Debtor respectfully requests that the documents requested in Exhibit A of the Subpoena
4 be provided.

5 DATED: June 30, 2021.

6 JOHNSON & GUBLER, P.C.
7 /s/ Matthew L. Johnson.
8 Matthew L. Johnson (6004)
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CERTIFICATE OF SERVICE

1. I caused the following document(s) to be served:

Debtor's Limited Opposition to Motion for Protective Order or, in Alternative, Motion for Modification of Subpoena

I served the above-named document(s) by the following means to the persons listed below:

☒ a. **ECF System on June 30 2021:**

Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

I declare under penalty of perjury that the foregoing is true and correct.

Signed on: June 30, 2021

/s/ Shae Bode

An employee of Johnson & Gubler, P.C.